



A t t o r n e y s a t L a w

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September 23, 2022

VIA Electronic Mail

Johner T. Wilson III, Esq.
Dinsmore & Shohl LLP
227 W. Monroe Street, Suite 3850
Chicago, IL 60606

Re: *Debora Bayne, et al. v. NAPW, Inc., et al.*
18-CV-3591 (MKB)(RER)

Dear Mr. Wilson

This firm represents Named Plaintiff Deborah Bayne (“Named Plaintiff”), FLSA Opt-in Plaintiffs, and members of the Rule 23 Class (collectively “Plaintiffs”) in the above referenced wage and hour litigation. Enclosed please find Plaintiffs’ opposition to Defendant PDN’s motion for summary judgment pursuant to Fed. R. Civ. P. 56, including:

- 1) Declaration of Jack L. Newhouse in Opposition to PDN’s motion for summary judgment with Exhibits A – T annexed thereto;
- 2) Plaintiffs’ R. 56.1 Counter-Statement of Material Facts;
- 3) Memorandum of Law in Opposition to PDN’s motion for summary judgment; and
- 4) Certificate of Service.

Plaintiffs will file these motion papers in accordance with the Court Ordered briefing schedule and the Judge’s individual rules.

Thank you,

/s/ Michele A. Moreno, Esq.